

**UNITED STATES DISTRICT COURT
IN AND FOR THE WESTERN DISTRICT OF WASHINGTON**

PAPER STREET MEDIA, LLC, a Florida limited liability company

Plaintiff,

VS.

IVAN SHELKOV, individually and d/b/a HQPORNER.COM; THOMAS KAHN, individually and d/b/a HQPORNER.COM; and DOES 1-20,

Defendants.

Case No.: 3:18-cv-05167-RBL

**DECLARATION OF JASON TUCKER
IN SUPPORT OF PLAINTIFF PAPER
STREET MEDIA LLC'S *EX PARTE*
MOTION FOR LEAVE FOR
ALTERNATIVE SERVICE**

I, Jason Tucker, declare:

1. I am a United States Citizen, over the age of 18 years old, make this declaration based upon personal knowledge and, if called to testify could and would testify competently to the facts set forth herein.

DECLARATION OF JASON TUCKER ISO
PLAINTIFF'S MOTION FOR ALTERNATIVE
SERVICE [NO. 3:18-cv-05167-RBL]

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FREEMAN LAW FIRM, INC.

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1 2. I am the President of Battleship Stance Inc. ("Battleship"), a leading intellectual
2 property management and anti-piracy enforcement company. Our clients include award winning
3 adult entertainment studios including Plaintiff.

4 3. Battleship is retained by some of the world's largest intellectual property rights
5 owners to provide intellectual property management, anti-piracy, and support services.

6 4. I have been in the business of legal adult entertainment production (both on and
7 off the Internet), marketing, and management at technical and executive level for over ten (15)
8 years, serving for over six (6) years as President of a company that owned and licensed one of
9 the world's largest libraries of erotic images.

10 5. I am a graduate of the FBI and DEA Citizens Academy and a member of
11 InfraGard. I have received advanced training by both agencies that in turn have furthered my
12 ability to assist seeking out and defining operations and pirate enterprises. My efforts have been
13 acknowledged with awards from State of California Senate, the FBI, DEA, and Los Angeles
14 Sheriff's Department as a few examples.

15 6. I have served as a consultant to Fortune 100 companies including Microsoft
16 Corporation for the rollout of several versions of Windows Media and in the development and
17 roll out of their Digital Rights Management technology and Akamai Technologies among others.

18 7. As an experienced executive within the adult entertainment industry, I have been
19 featured and quoted in publications including Newsweek, BusinessWeek, USA Today, Wired,
20 and the Washington Post and frequently am requested to speak on panels and at seminars at
21 industry events on various industry related topics and trends including anti-piracy.

22 8. Battleship Stance Inc. was retained by Paper Street Media LLC to investigate
23 copyright and trademark violations and assist in enforcing their intellectual property rights.

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1 9. As a part of my duties to Paper Street Media LLC, I have investigated the web
2 site HQPorner.com. In doing so, I have located copyrighted works owned by Paper Street Media
3 LLC that are displayed on HQPorner.com without license or authority.

4 10. The web pages of HQPorner.com fail to state any owner or operator of the site.

5 11. I have researched HQPorner.com with the United States Copyright Office DMCA
6 Registration listings. The owners and operators of HQPorner.com have not registered the web
7 site as an Internet Service Provider. There are no records of HQPorner.com with the Copyright
8 Office, and thus no ownership or operator information.

9 12. In April 2018, I was provided with information provided by Network Solutions,
10 which provided registrar services for HQPorner.com. This information included the physical
11 address Svetlanovsky Prospekt 61/2, 62 Saint Petersburg, Russia. I investigated this specific
12 address and discovered that it did not exist. I further researched variations on the address in
13 English and Russian languages, including Svetlanovsky Prospekt 61 Saint Petersburg, Russia
14 and Svetlanovsky Prospekt 62 Saint Petersburg, Russia. These variations also do not exist.
15 These addresses cannot lead to the location of Mr. Ivan Shelkov.

16 13. I have attempted to locate a physical address for Ivan Shelkov through Internet
17 investigation tools, but am unable to locate an address that can be specifically tied to him.

18 14. The Network Solutions records also included an email address for Ivan Shlekov,
19 aferod@yande.com. In May 2018, I sent Shelkov an email, to aferod@yande.com, informing
20 him that he had been identified as an operator of HQporner.com and requested an opportunity to
21 discuss the matter. No one responded to the email, but importantly the email was verified as
22 valid and did not bounce back. Further, the recipient of the email did not deny he was Shelkov,
23 or associated as an operator of HQPorner.com.

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15. While this litigation has been pending, I continued to send DMCA complaint take-down notices to HQPorner.com in attempt to get unauthorized copyrighted works taken off the site.

16. In May 2018, the owners or operators of HQPorner.com responded to me from the email address hello@hqporner.com, stating “Dear Jason, Please send all URLs in one letter so we can quickly remove all of your materials. Regards, Thomas Khan HQporner abuse department.”

17. Less than an hour later, I replied to the email exactly as requested, with a single email listing the URLs with infringing material. The copyrighted works were not removed from the identified URLs, and remain displayed as of the date of this motion. No one responded to the email, but importantly the email was verified as valid and did not bounce back.

18. In September 2018, I sent another set of DMCA Compliant takedown notices to hello@hqporner.com and abuse@hqporner.com. These notices were the same notices sent in May 2018. No one responded to the email, but importantly again, the email was verified as valid and did not bounce back.

19. I have attempted to search for a physical address for Mr. Khan. However, without knowing the area of the world he lives in, or that HQPorner.com is operated from, this endeavor is virtually impossible and has failed.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Execute on the 17th day of October, 2018 at Scottsdale, Arizona.

Jason Tucker

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